

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

JOSHUA J. ANGEL,)	
)	
Plaintiff,)	No. 22-867C
)	(Senior Judge Margaret M. Sweeney)
v.)	
)	
THE UNITED STATES,)	
)	
Defendant.)	

DEFENDANT’S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME

Pursuant to Rule 6(b) of the Rules of the United States Court of Federal Claims, defendant, the United States, respectfully requests a 14-day enlargement of time within which to file its reply in support of its motion to dismiss plaintiff’s complaint. The United States’ reply is currently due on February 28, 2023. The enlargement would bring the date for responding to the complaint to March 14, 2023. This is defendant’s first request for an enlargement of time for this purpose. Plaintiff, Joshua J. Angel, indicated on February 21, 2022, that plaintiff does not oppose this motion.

On November 15, 2022, the Court issued an order granting Mr. Angel’s motion for an enlargement as well as ordering that the United States file its response to Mr. Angel’s complaint by January 17, 2023, and that, should that response be a motion to dismiss, Mr. Angel file his response by March 17, 2023. Order, ECF No. 11. On January 17, 2023, the United States filed a motion to dismiss. ECF No. 12. On February 14, 2023, Mr. Angel filed his response to the United States’ motion to dismiss. ECF No. 13. Pursuant to the Rules of the United States Court of Federal Claims, the United States’ reply is currently due on February 28, 2023.

Good cause exists to grant this motion. Additional time is required for counsel for the Department of Justice to prepare its reply, in coordination with counsel for the United States

Department of Treasury and Federal Housing Finance Agency, as well as to finalize the response following supervisory review. Moreover, counsel for the United States is currently engaged in briefing and other case development in a number of other cases in this Court, including compiling a voluminous administrative record, due on February 24, in the consolidated bid protests in *Jacobs Technology Inc. v. United States*, Nos. 23-167, 23-232.

For these reasons, the United States respectfully requests that the Court grant this unopposed motion for an enlargement of time of time of 14 days, to and including March 14, 2023, within which to file its reply in support of its motion to dismiss plaintiff's complaint

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

PATRICIA M. McCARTHY
Director

s/ Elizabeth M. Hosford
ELIZABETH M. HOSFORD
Assistant Director

s/ Anthony F. Schiavetti
ANTHONY F. SCHIAVETTI
Senior Trial Counsel
Commercial Litigation Branch
Civil Division
U.S. Department of Justice
P.O. Box 480
Ben Franklin Station
Washington, DC 20044
Tel: (202) 305-7572
Fax: (202) 307-0972
anthony.f.schiavetti@usdoj.gov

OF COUNSEL:

FRANKLIN E. WHITE, JR.
Assistant Director

RETA E. BEZAK
Senior Trial Counsel

MARIANA T. ACEVEDO
Trial Attorney

Attorneys for Defendant

February 21, 2023